

James E. Cecchi  
Donald A. Ecklund  
CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700

Robert Prongay  
Casey Sadler  
GLANCY PRONGAY & MURRAY LLP  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
(310) 201-9150

*Attorneys for Lead Plaintiff Bin Qu*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CHAO SUN, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

DAQING HAN, XIAOLI YU, HONG LI,  
MING LI, LIAN ZHU, GUANGHUI  
CHENG, GUOBIN PAN, GUANGJUN LU,  
YUANPIN HE, MAZARS CPA LIMITED,  
MAZARS Srl, WEISERMAZARS LLP, and  
TELESTONE TECHNOLOGIES  
CORPORATION,

Defendants.

Case No. 2:15-cv-00703-JMV-MF

**NOTICE OF MOTION**

TO: All Persons on ECF service list

PLEASE TAKE NOTICE that at such date and time as the Court shall determine, Lead Plaintiff, Bin Qu, through his undersigned counsel, shall move before the Hon. John Michael Vazquez, U.S.D.J. at the Frank R. Lautenberg United States Post Office and Courthouse Building, 2 Federal Square, Newark, New Jersey 07102, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of the proposed Order Preliminarily Approving Settlement

and Providing for Notice which, among other things, will (i) preliminarily approve the proposed Settlement; (ii) certify the proposed Settlement Class, appoint Lead Plaintiff as class representative, and appoint Co-Lead Counsel as class counsel for purposes of the Settlement; (iii) approve the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iv) schedule a hearing to consider final approval of the Settlement.

The undersigned intend to rely upon the annexed Memorandum of Law. The Stipulation and Agreement of Settlement and the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice and its exhibits are enclosed herewith.

Dated: February 24, 2017

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

By: /s/ Donald A. Ecklund  
James E. Cecchi  
Donald A. Ecklund  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700

GLANCY PRONGAY & MURRAY LLP

By: /s/ Robert V. Prongay  
Robert V. Prongay  
Casey E. Sadler  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
(310) 201-9150

*Co-Lead Counsel for Lead Plaintiff Bin Qu*